

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Skky, Inc., Plaintiff, vs. Manwin USA, Inc., and Manwin Holding, s.a.r.l, Defendants.	Case No.:	13-2086 (PJS/JJG)
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Skky, Inc., Plaintiff, vs. Playboy Enterprises, Inc., Defendant.	Case No.:	13-2089 (PJS/JJG)
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DEFENDANTS' MEET AND CONFER STATEMENT

On January 16, 2014 and February 25, 2014, counsel for Defendants Manwin USA, Inc., Manwin Holding s.a.r.l., and Playboy Enterprises, Inc., Todd Noshier; and counsel for Plaintiff Skky, Ryan Schultz, met and conferred via telephone to discuss the prohibitions of the December 20, 2013 Judgment of the Court of Quebec as entered by the Honorable Armando Aznar, J.C.Q in Case No. 500-22-208549-132 ("Judgment") as it relates to discovery sought by Plaintiff, such as Plaintiff's document requests, interrogatories and deposition notices.

During the meet and confer, counsel for Defendants explained that Defendants are specifically restricted from producing "any document, resume, or digest of document"

including source code, accounts, reports and inventories “irrespective of whether it is kept or stored in physical format, electronic format or other format” relating to “Quebec Inc. or any other business concern in Quebec.” Counsel for Defendants further explained that Quebec Inc. is a non-party corporate entity related to the Manwin Defendants and is in sole possession of certain technical documents and information residing in Quebec that is subject to the Judgment and seemingly responsive to certain Skky discovery requests. Because Manwin operates numerous websites accused of infringement in the Manwin and Playboy litigations, the Judgment is relevant to discovery in both actions.

During the meet and confer, counsel for the Defendants provided alternative methods for Plaintiff to obtain its discovery without violation of the Judgment, including third-party subpoenas and depositions based on personal knowledge. Plaintiff declined such offers, and has since filed a motion to compel on March 5, 2014.

Dated: March 13, 2014

s/Justi Rae Miller

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